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November 12, 2003

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Support for the Consensus Plan for 800 MHz Realignment
Ex Parte, WT Docket No. 02-55

Dear Ms. Dortch:

The City of Cambridge Massachusetts operates an 800 MHz Public Safety trunked radio system providing critical public safety communications for police, fire, emergency medical, HAZMAT, bomb units and various city departments' personnel. We are actively following this vital proceeding for public safety and request that our views be considered as Cambridge has and continues to experience interference issues that plague our communications system.

First responders in the City of Cambridge throughout Massachusetts and across the Nation are increasingly at risk because their public safety radio communications are vulnerable to interference from cellular phones. As cellular usage increases, the constant addition of cellular sites the risk of garbled or blocked police, fire and other public safety communications increases. First responders also urgently need more 800 MHz spectrum to have "interoperable" communications among police and firefighters and among neighboring jurisdictions. Fortunately, a solution is available.

The City of Cambridge is constantly expending time, and resources to tracking and dealing with interference issues. The sad reality is that although working with Nextel we can mitigate to a certain degree these issues; the bottom line is we cannot under the present frequency allocation eliminate these problems. My worst scenario is having a public safety member seriously injured or suffer a fatality do to this situation. We need your assistance to mitigate this situation at your level.

The Federal Communications Commission has before it a "Consensus Plan" that would address cellular/public safety radio interference problems and provide more of the spectrum that first responders urgently need for radio communications. We support the Consensus Plan along with the Association of Public-Safety Communications Officials-International, Inc.; the International Association of Fire Chiefs, Inc. and International Municipal Signal Association; the International Association of Chiefs of Police, the Major Cities Chiefs Association; the Major County Sheriffs' Association; and the National Sheriffs' Association. The FCC must adopt the Consensus Plan expeditiously in its public safety spectrum rulemaking, WT Docket No. 02-55.

The Consensus Plan offers the only real, near-term solution to existing public safety radio problems. The Plan provides a comprehensive solution that addresses interference to public safety systems, allocates additional spectrum for public safety needs, provides private funding to compensate licensees that may need to relocate to new channels as the result of the Plan, and ensures that all affected licensees receive equivalent replacement spectrum as part of the spectrum swaps called for by the Consensus Plan.

Other proposals that have been made to the FCC fall far short and must be rejected. The UTC/cellular "plan" ignores the problems faced by public safety communicators and suggests that case-by-case, after-the-fact solutions could be found once interference manifests itself. Responding only after-the-fact to the problems affecting time-critical public safety services is not acceptable, since a single interference incident can jeopardize the lives of emergency personnel and the citizens they serve.

Section 1 of the Communications Act of 1934, provides that the FCC is to "promote safety of life and property through the use of wire and radio communication." The Consensus Plan would greatly advance this vital objective. It has been over sixteen months since the FCC began its public safety spectrum proceeding and over one year since the Consensus Plan was submitted. Supporters of the Consensus Plan have recently addressed the remaining implementation details associated with the Plan. There is no reason for the FCC to postpone action any further.

We urge the FCC to resolve the issues facing the public safety community expeditiously and adopt the terms of the Consensus Plan. We appreciate your help and stress that a serious interference incident can and will occur, our collective goal is to remediate this situation as quickly as possible to protect our public safety personnel to the best of our ability.

Sincerely,

Gerald R. Reardon
Chief of Department
Radio Systems Engineer

cc Senator Edward M. Kennedy
 Senator John F. Kerry
 Representative John Tierney
 Representative Michael Capuano
 Representative Edward Markey